

Exhibit A

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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:12-cr-659-MO

Plaintiff,

AFFIDAVIT IN SUPPORT OF MOTION
FOR DEFENSE ACCESS TO *EX PARTE*
PROCEEDINGS AND DOCUMENTS

v.

REAZ QADIR KHAN,

Defendant.

STATE OF OREGON)
) ss.
County of Multnomah)

I, Amy Baggio, being duly sworn, depose and state as follows:

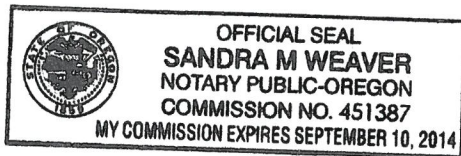
1. I am counsel of record in this matter for the defendant, Reaz Qadir Khan.
2. I was previously issued a “Secret” level security clearance in the course of my representation of the petitioner in *Nazar Gul v. George W. Bush, et al.*, District Court for the District of Columbia, Case No. CV 05-8888(CKK).
3. My security clearance was renewed in 2011-2012.
4. In January of 2014, I telephoned the Court Security Office (CSO) in Washington D.C. to inquire about the status of my security clearance. I spoke with a court security officer who informed me that her records reflect that my security clearance is active, but was granted with specific regard to the *Gul* case.
5. I asked the CSO what was needed in order to alter my clearance for use in another case. The CSO informed me that the prosecutor on the new case would need to update the “Need to Know” and “Reason for Access” fields for security clearances, which vary from matter to matter.
6. On January 30, 2014, co-counsel John Ransom contacted AUSA Ethan Knight to inquire about both of us receiving security clearances for this case. Mr. Knight replied that he did not believe it necessary for us to obtain clearances.
7. In 2014, research and writing attorney Ryan O’Connor was retained to assist the defense in writing motions on behalf of Mr. Khan. Mr. O’Connor has already begun assisting me in research and writing with regard to the Foreign Intelligence Surveillance Act (FISA) and FISA Amendments Act litigation.


8. Both Ryan O'Connor and John Ransom are willing to submit to the process to obtain a security clearance in furtherance of their efforts to defend Mr. Khan.



Amy Baggio

SUBSCRIBED AND SWORN to before me on April 28, 2014.





Notary Public for Oregon

My Commission Expires: 9-10-14